

FORM TO BE USED BY A PRISONER FILING A
42 U.S.C. § 1983 CIVIL RIGHTS COMPLAINT
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

I. CAPTION

Clarence Vaiden Litchfield
(Enter the full name of the plaintiff or plaintiffs)

v.

Kyle Russel Warden et al
Janine Donate Director et al
Lehigh County Commissioner et al
(Enter the full name of the defendant or defendants)

Case No. 5:21-cv-5068-JDW

II. PARTIES

a. Plaintiff

Full name: Clarence V. Litchfield

Prison Identification number: ~~0808035~~ 0208035

Place of present confinement: Lehigh County Prison

Address: 38 N. 4th St. Allentown P.A., 18101

Place of confinement at time of incidents or conditions alleged in complaint, including address:

LCP

Additional plaintiffs: Provide the same information for any additional plaintiffs on the reverse of this page or on a separate sheet of paper.

b. Defendants: (list only those defendants named in the caption of the complaint, section I)

1. Full name including title: Kyle Russel Warden

Place of employment and section or unit: LCP

2. Full name including title: Janine Donate Director

Place of employment and section or unit: LCP

3. Full name including title: Commissioner

Place of employment and section or unit: Lehigh County

4. Full name including title: Lehigh County Executive

Place of employment and section or unit: Lehigh County

Additional defendants: Provide the same information for any additional defendants on the reverse of this page or on a separate sheet of paper.

III. PREVIOUS LAWSUITS

Instructions:

If you have filed other lawsuits in any federal or state court dealing with the same facts as this complaint or other facts related to your imprisonment, you must provide the information requested below. If you have not filed other lawsuits, proceed to Section IV, Administrative Remedies, on this page.

If you have filed other lawsuits, provide the following information.

Parties to your previous lawsuit:

Plaintiffs Amending Complaint, Approve X

Defendants Forma Pauperis to proceed Pro Se.

Issues: _____

Court: if federal, which district? _____

if state, which county? _____

Docket number: _____ Date filed: _____

Name of presiding judge: _____

Disposition: (check correct answer(s)): Date: _____

Dismissed _____ Reason? _____

Judgment _____ In whose favor? _____

Pending _____ Current status? _____

Other _____ Explain _____

Appeal filed? _____ Current status? _____

Additional lawsuits. Provide the same information concerning any other lawsuits you have filed concerning the same facts as this action or other facts related to your imprisonment. You may use the back of this page or a separate sheet of paper for this purpose.

IV ADMINISTRATIVE REMEDIES

Instructions:

Provide the information requested below if there is an administrative procedure to resolve the issues you raise in this complaint. Examples of administrative procedures include review of grievances, disciplinary action, and custody issues. If no administrative procedures apply to the issues in this complaint, proceed to Section V, Statement of Claim, on page 4.

- a. Describe the administrative procedures available to resolve the issues raised in this complaint:

Type of procedure. (grievance, disciplinary review, etc.)

Grievance, denied

Authority for procedure. (DC-ADM, inmate handbook, etc.)

Formal or informal procedure. ?

Who conducts the initial review? Doug Mafe

What additional review and appeals are available? Grievance to
warden

- b. Describe the administrative procedures you followed to resolve the issues raised in this complaint before filing this complaint:

On what date did you request initial review? Not sure

What action did you ask prison authorities to take? To be taken off
the oppressive lock down

What response did you receive to your request? When it is deemed
appropriate

What further review did you seek and on what dates did you file the requests?

" 1983 "

What responses did you received to your requests for further review?

- c. If you did not follow each step of the administrative procedures available to resolve the issues raised in this complaint explain why?

V. STATEMENT OF CLAIM

Instructions:

State here as briefly as possible the facts of your case. Use plain language and do not make legal arguments or cite cases or statutes. State how each defendant violated your constitutional rights. Although you may refer to any person, make claims only against the defendants listed in the Caption, Section I. Make only claims which are factually related. Each claim should be numbered and set forth in a separate paragraph with an explanation of how the defendants were involved. Use the reverse of this page or a separate sheet of paper if you need more space.

Statement of Claim:

I was confined in the LCP do to my inability to afford the monetary bail requirement for pretrial liberty, since August 31, 2021, It is now February 25, 2022. During this entire time the Lehigh County Jail has implemented, a super restrictive lock down procedure in the name of covid measures. Restrictive confinement by nature is a punishment use to deter negative behavior amongst many other things. The Bureau of Prison issue covid guideline's to be followed, which most institution attempted to reflect. Those guideline's was to sent off all necessary staff, no congregational movements in a attempt to stop a viral spread. Which was an attempt at social distancing. The restrictive cell confine was issue upon the Identification of covid, and to be for 14 to 21 days. 22 to 23 hrs a day. Higher quality of food.

VI. RELIEF

Instructions: Briefly state exactly what you want the Court to do for you.

Relief sought:

Seek relief for Mental anguish, pain and suffering, duress
Compensatory, punitive, monetary, nominal in the amount of
\$10,000,000 and injunctive relief, to be taken of this torturous
lock down, mental health groups, religious service, 1 contact visit a month.

VII. DECLARATION AND SIGNATURE

I (we) declare under penalty of perjury that the foregoing is true and correct.

2-27-22

DATE

Clarence Litchfield

SIGNATURE OF PLAINTIFF(S)

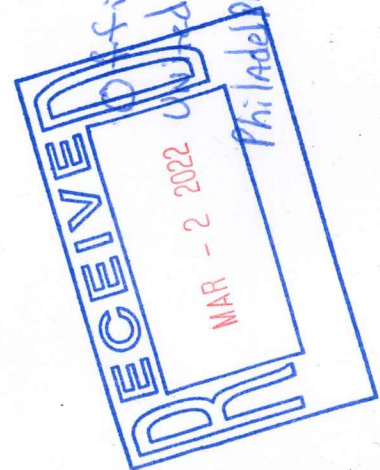
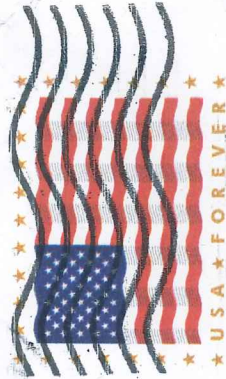
Do to the psychological effect of restrictive confinement
 The BOP or any facility had that in mind. LCP has had 3
 actual "found none responsive's" Suicides since these lock
 down measure have been in place for two years, not 14 days
 or 21 but 2 years. As a Warden, Director, they should have
 been aware of the devastating effects of imposing involuntary
 long term confinement. Several other inmates were found
 hanging in their cells, but saved by staff or other inmates. Pretrial
 confinement should never impose medical treatment nor exacerbate
 those that are pre-existing. I suffer from pre-existing mental health
 disorders which have been exacerbated do to this restrictive confinement
 Nightmares, extreme paranoia, suicidal thoughts, extreme
 depression, anxiety, P.T.S. I have not been duly convicted of any crime
 nor have I committed any institutional infractions warranting solitary
 confinement. The restrictive nature of solitary confinement is the punishment
 use to deter negative behavior of prisoners, not the name!!! Covid measure
 as a name does not change the psychological harmful effects of the
 confinement. Which is as logical as the government putting Jewish
 people in a concentration camp, but telling them it's a protective measure!
 This is a reckless disregard for the health of the inmate confined in this
 institution, and the deliberate indifference of ~~my~~ constitutional protection
 Due Process (14th Amendment) Cruel and unusual Punishment (8th) This torture
 confinement is upon the legally innocent. Now I have to be proven innocent
 to be free of punishment, what should never happen. A policy has the
 ability to be a de facto punishment order ^{without} ~~with~~ the intent to punish,
 but having knowledge of the effect of the policy. The Commissioner of
 Henrich County is the employer of the LCP staff. They fail to adequately
 train their staff on the protection of civil rights, and are all held
 accountable in their official capacity. As a pro se litigant I should not
 be held to the legal standard of a practicing attorney. I sided the city of
 Allentown under the presumption they were the employer of LCP. seek account-
 ability for their employer (LCP), which should have been conserved to need so.

NAME: Clarence Litchfield
LEHIGH COUNTY JAIL
38 NORTH 4TH STREET
ALLENTOWN, PA 18102-3489

#0208035

LEHIGH VALLEY PA 180

28 FEB 2022 PM 2 L



Office of The Clerk
United States District Court
Philadelphia, PA 19106-9865

U.S.M.S.
K-RAY

19106-98655

